

**TECHNICAL REVIEW DOCUMENT**  
**For**  
**RENEWAL OF**  
**OPERATING PERMIT 01OPBE233**  
to be issued to:

Las Animas Municipal Power Plant  
Bent County  
Source ID 0110005

Prepared by Cathy Rhodes  
March, 2006

**I. PURPOSE:**

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued on February 1, 2002 and expires on February 1, 2007. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted on January 30, 2006. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

**II. Source Description:**

This source is classified as an electric services facility under Standard Industrial Classification 4911. The Las Animas Municipal Power Plant consists of five (5) operable internal combustion engine – electrical generating sets. The units were originally installed and operated for year-round, baseload operation, but have been operating in a standby mode since the early 1980's. The generator sets are rated as follows: Unit 1 - 300 kw; Unit 2 - 250 kw; Unit 4 – 1,225 kw; Unit 5 – 1,225 kw; and Unit 6 – 3,000 kw. Units 1 and 2 are diesel fired, and Units 4, 5, and 6 are dual fuel fired, either diesel fuel alone or a combination of diesel and natural gas

This facility is located in Las Animas at 8<sup>th</sup> & Moore, in Bent County. This facility is located in an area that has been designated as attainment for all criteria pollutants. There are no affected states located within 50 miles of the facility. There are no federal class I designated areas within 100 km of this facility.

Facility wide emissions are as follows (tons/year):

<u>Pollutant</u>	<u>Actual</u>	<u>Potential</u>
Particulate Matter	<1	61
PM <sub>10</sub>	<1	58
Nitrogen Oxides (NO <sub>x</sub> )	4	866
Sulfur Dioxide (SO <sub>2</sub> )	<1	57
Volatile Organic Compounds (VOC)	<1	58
Carbon Monoxide	1	185

Actual emissions are based on the most recent submitted APENs. Potential emissions are based on maximum operating rates.

This facility does not emit significant amounts of Hazardous Air Pollutants (HAPs), according to the permit application. The facility is not subject to the Accidental Release Plan provisions of 112(r)(7) of the Clean Air Act.

#### **Prevention of Significant Deterioration (PSD)**

This plant is located in an area designated as attainment for all pollutants. The facility is an existing major source for purposes of PSD.

#### **Compliance Assurance Monitoring (CAM)**

This facility does not employ control equipment, and is not subject to the CAM requirements.

#### ***Title IV Acid Rain***

This facility is not subject to the Acid Rain provisions. They were constructed prior to the applicability date, and the size of the units is below applicable rates.

## **II. Discussion of Modifications Made**

### ***Source Requested Modifications***

The permittee requested the following revisions to the Operating Permit in their renewal application.

Information Page

Revisions to Permit Contact information.

Section I

Condition 1.3.2 – The permittee requested the opacity monitoring frequency to be changed from quarterly to annually. The condition is revised to reflect current Division monitoring requirements for emergency backup engines. These engines operate

infrequently, therefore the Division has determined that an annual opacity reading is sufficient. In addition, the language regarding “nonroutine visible emissions” is deleted.

### ***Other Modifications***

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Las Animas Municipal Operating Permit:

### **Information Page**

Add language indicating when annual and semiannual reports must be received by the Division.

### **Section I**

Condition 1.5 – Revised to change Condition 21 to 22 to reflect revisions to Section IV.

Condition 3.1 – Revised to reflect current Division permit language.

Condition 4.1 - Revised to reflect current Division permit language.

Condition 6 – Added for Compliance Assurance Monitoring (CAM) requirements. No add on control devices are used at this facility, therefore the CAM provisions do not apply to any units.

### **Section II**

Condition 1.3 – Revised to update opacity language to current Regulation No. 1 language.

### **Section III**

Update Permit Shield regulatory cite.

Condition 1 – Revised to reflect current Division permit language.

### **Section IV**

Update to reflect revisions made to Regulation cites.

### **Appendices B & C**

Incorporate Division’s latest versions.

### **Appendix D**

EPA addresses are updated.